

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	BANKRUPTCY CASE NO. 12-26201-GLT
	:	
Samuel M. DiFatta	:	CHAPTER 13
Mary L. DiFatta	:	
Debtor.	:	
	:	
Gainey Law Offices LLC	:	
Movant.	:	
	:	
vs.	:	
Ronda J. Winnecour	:	
Chapter 13 Trustee	:	
Respondent.	:	

Exhibit "D"
Case History and Narrative

The debtors met with counsel on December 20, 2012 for an overall review of their financial situation. After said consultation it was determined the debtors would file a chapter 13 bankruptcy. Debtors filed an emergency petition with this Honorable Court on December 31, 2012. On January 2, 2013 a completed petition and plan were filed.

The debtors plan was funded throughout by a wage attachment. Said wage attachment was amended throughout the course of the bankruptcy in order to maintain the goals of the plan and to complete the chapter 13 plan. Said plan was recently completed and the wage attachment was terminated as plan obligations were met in full.

During the course of the bankruptcy, counsel attended two meeting of creditors, five separate conciliations, and addressed notice of mortgage payment changes while also handling review and addressing proofs of claims and objections. Counsel also filed a successful 506 complaint on debtors 2nd mortgage.

Counsel also filed an LMP with regard to said debtors. The \$1,000.00 fee was paid to counsel upon completion. This fee application is seeking no additional fees for said LMP. The application consists only of work separate from the LMP.

Debtors plan has reached its 60 month term and has been fully funded. Debtors have filed the requisite financial management certificates along with a certificate of discharge eligibility. The chapter 13 trustee is in the process of taking the requisite steps to close out the above-mentioned case.

DATE: February 26, 2018

Respectfully Submitted,

/s/ Richard P. Gainey

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